

MCDERMOTT WILL & EMERY LLP

Darren Azman
John J. Calandra
Joseph B. Evans
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444

Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	:	Case No. 22-10943 (MEW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF STIPULATED ORDER CONCLUDING
MEDIATION PURSUANT TO COURT’S MEDIATION PROCEDURES**

PLEASE TAKE NOTICE that Paul R. Hage, as Plan Administrator for the Voyager Wind-Down Debtor, which consists of Debtors Voyager Digital Holdings, Inc.; Voyager Digital, Ltd.; and Voyager Digital, LLC (collectively, “Voyager” and referred to after May 19, 2023 as, the “Wind-Down Debtor”), through his undersigned counsel, in accordance with the Case Management Procedures and Local Rule 9074-1, will present the proposed *Stipulated Order Concluding Mediation Pursuant to Court’s Mediation Procedures*, attached hereto as **Exhibit A** (the “Stipulated Order”), to the Honorable Michael E. Wiles, United States Bankruptcy Judge,

¹ The Wind-Down Debtor in these chapter 11 cases consists of Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address and principal place of business is 27777 Franklin, Suite 2500, Southfield, MI 48034.

United States Bankruptcy Court for the Southern District of New York (the “Court”), on October 3, 2024 at 12:00 p.m. (Eastern Time) for approval and signature.

PLEASE TAKE FURTHER NOTICE that the following parties have agreed to the Stipulated Order: (i) the Plan Administrator for the Wind-Down Debtor and (ii) Ethos.io PTE Ltd. (“Ethos”), Amano Global Holdings Inc. (“Amano”), Adam, Aiko Nomura, and Shingo Lavine (collectively, the “Lavines” and, together with Ethos and Amano, the “Ethos Parties”).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Stipulated Order is filed with the Court in accordance with the customary practices of the Court and General Order M-399 and delivered to the undersigned and the chambers of the Honorable Michael E. Wiles, so as to be received by October 3, 2024 at 11:00 a.m. (Eastern Time), there will not be a hearing to consider the Stipulated Order absent questions from the Court, and the Stipulated Order may be signed and entered by the Court.

Dated: September 26, 2024
New York, New York

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

Darren Azman

John J. Calandra

Joseph B. Evans

One Vanderbilt Avenue

New York, New York 10017-3852

Telephone: (212) 547-5400

Facsimile: (212) 547-5444

E-mail: dazman@mwe.com

jcalandra@mwe.com

jbevans@mwe.com

*Counsel to Paul R. Hage, as Plan
Administrator for the Voyager Wind-Down
Debtor*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a true and correct copy of the foregoing *Notice of Presentment of Stipulated Order Concluding Mediation Pursuant to Court's Mediation Procedures* to be served on September 26, 2024, upon (i) all parties in these chapter 11 cases that are registered or otherwise entitled to receive electronic notices via electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York, and (ii) the following party via electronic mail:

Douglas T. Tabachnik
63 W. Main St.
Freehold, NJ 07728
E-mail: dtabachnik@dttlaw.com

Counsel for the Ethos Parties

/s/ Darren Azman
Darren Azman

Exhibit A
Stipulated Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	Case No. 22-10943 (MEW)
)	
Debtors. ¹)	(Jointly Administered)
)	

**STIPULATED ORDER
CONCLUDING MEDIATION PURSUANT TO COURT’S MEDIATION PROCEDURES**

Pursuant to Paragraph 3.4 of this Court’s Procedures Governing Mediation of Matters and the Use of Early Neutral Evaluation and Mediation/Voluntary Arbitration in Bankruptcy Cases and Adversary Proceedings, Paul R. Hage, as Plan Administrator for the Voyager Wind-Down Debtor, which consists of Debtors Voyager Digital Holdings, Inc.; Voyager Digital, Ltd.; and Voyager Digital, LLC (collectively, “Voyager” and referred to after May 19, 2023 as, the “Wind-Down Debtor”), on the one hand, and, on the other hand, Ethos.io PTE Ltd. (“Ethos”), Amano Global Holdings Inc. (“Amano”), Adam, Aiko Nomura, and Shingo Lavine (collectively, the “Lavines” and, together with Ethos and Amano, the “Ethos Parties” and, collectively with the Wind-Down Debtor, the “Parties”) hereby stipulate and agree that the “Claims” referenced in the Parties’ June 11, 2024, “Stipulated Order Regarding Mediation Between Ethos.io PTE Ltd., Amano Global Holdings, Inc., and Adam Lavine, Aiko Nomura Lavine, and Shingo Lavine and the Wind-Down Debtor” have been resolved pursuant to mediation in a confidential settlement agreement.

¹ The Wind-Down Debtor in these chapter 11 cases consists of Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address and principal place of business is 27777 Franklin, Suite 2500, Southfield, MI 48034.

AGREED and stipulated as of September 24, 2024

MCDERMOTT WILL & EMERY LLP

LAW OFFICES OF DOUGLAS T. TABACHNIK

By: /s/ John J. Calandra

By: /s/ Douglas T. Tabachnik

Darren Azman
John J. Calandra
Joseph B. Evans
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
dazman@mwe.com
jcalandra@mwe.com
jbevans@mwe.com

Douglas T. Tabachnik
63 W. Main St.
Freehold, NJ 07728
Telephone: 732-780-2760
dtabachnik@dtlaw.com

On behalf of the Ethos Parties

*On behalf of Paul R. Hage, as Plan
Administrator for the Voyager Wind-
Down Debtor*

Dated: October ____, 2024
New York, New York

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE